

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SECOND MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JANUARY 1, 2023 THROUGH JANUARY 31, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	01/01/2023	01/31/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$104,176.80 ¹ (80% of \$130,221.00)	
Total Reimbursable Expenses Requested in this Statement:	\$1,089.21 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$115,913.50	
Total Actual Attorneys Hours Covered by this Statement:	173.50	
Average Hourly Rate for Attorneys:	\$668.08	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$14,307.50	
Total Actual Paraprofessional Hours Covered by this Statement:	48.50	
Average Hourly Rate for Paraprofessionals:	\$295.00	

¹ Counsel is holding \$278,108.88 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Second Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from January 1, 2023 through January 31, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$104,176.80 (80% of 130,221.00) as compensation for professional services rendered to the Debtor during the period from January 1, 2023 through January 31, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$1,089.21, for a total amount of \$105,266.01 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$104,176.80 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$1,089.21 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$105,266.01³ which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

³ Such payment to be made first from any existing retainer funds held by C&D for the Debtor.

Houston, TX
Dated: March 2, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 737.218.6187
Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on March 2, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Online Research	3.40
Working Meals	134.79
Lodging/Travel	951.02

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	62.00	11.4
B120 Asset Analysis and Recovery	20.90	10.9
B130 Asset Disposition	1.30	0.9
B140 Relief from Stay/Adequate Protection	4.70	0.4
B150 Meetings of & Communications with Creditors	8.80	0.2
B160 Fee/Employment Applications	45.70	22.40
B170 Fee/Employment Objections	71.80	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	13.70	1.4
B190 Other Contested Matters	9.70	0.6
B195 Non-Working Travel	4.00	0.00
B210 Business Operations	11.50	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	13.30	0.00
B250 Real Estate	0.00	
B260 Board of Directors Matters	0.00	
B310 Claims Administration and Objections	1.30	0.00
B320 Plan and Disclosure Statement	.30	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	173.50	48.50

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

February 28, 2023
Invoice # 750396

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$130,221.00
Current Invoice Total Expenses	<u>\$1,089.21</u>
Current Invoice Total	<u>\$131,310.21</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 750396 and any other invoice numbers being paid on your remittance.

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Responsible Attorney

Vickie L. Driver

Post - petition

SUMMARY OF PREVIOUS UNPAID INVOICES

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Amount Billed</u>	<u>Credits Applied</u>	<u>Balance Due</u>
748460	01/27/2023	216,152.92	-173,698.12	42,454.80
	TOTALS:	<u>\$216,152.92</u>	<u>\$-173,698.12</u>	<u>\$42,454.80</u>

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Responsible Attorney

Vickie L. Driver

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01/02/2023	C. Stephenson	B110/	Review correspondence and messages regarding document production and request information.	1.40
01/03/2023	C. Craig	B190/	Review and analyze Texas State Court filings to assess status of actions against Debtor.	0.30
01/03/2023	C. Stephenson	B110/	Review and respond to correspondence regarding requests for information and specific documents (2.4); calls regarding same (1.2); review and respond to inquiries regarding specific creditor notices (1.3).	4.90
01/04/2023	C. Stephenson	B195/	Nonworking travel to Austin to meet with FAs and FSS professionals [billed at half time] (4.0).	2.00
01/04/2023	E. Weaver	B110/	Electronic case file management of final versions of pleadings and FSS and AJ filings.	3.20
01/04/2023	E. Weaver	B120/	Electronic document and case file management of motor home loan documents.	0.60
01/05/2023	C. Craig	B160/	Draft revisions to proposed order on interim compensation motion based on Trustee's Office and Unsecured Creditor Committee comments.	0.40

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01/05/2023	C. Craig	B160/	Draft revisions to proposed order on application to employ Jordan & Ortiz based on Trustee's Office and Unsecured Creditor Committee comments.	0.30
01/05/2023	C. Craig	B160/	Draft revisions to proposed order on application to employ Crowe & Dunlevy based on Trustee's Office and Unsecured Creditor Committee comments.	0.30
01/05/2023	C. Craig	B210/	Draft revisions to proposed order on utility motion based on Trustee's office and Unsecured Creditor Committee comments.	0.30
01/05/2023	C. Stephenson	B110/	Meetings with FAs and FSS staff (3.5); meetings with business people (1.1); working dinner with B. Schliezer and H. Kessler (1.7).	5.30
01/05/2023	C. Stephenson	B160/	Review revised orders and comments from UST and UCC on professional applications and interim compensation motion.	2.30
01/05/2023	C. Stephenson	B210/	Review revised proposed order on utility motion and related correspondence.	0.60
01/05/2023	E. Weaver	B110/	Review client files on Litshare to determine if we have the trust document for the Missouri779384 Trust (.4); email correspondence to C. Stephenson regarding same (.1).	0.50

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Post - petition

01/05/2023	E. Weaver	B160/	Review case docket and compile relevant pleadings to prepare for 01-06-2023 status conference in the FSS case.	2.80
01/05/2023	E. Weaver	B160/	Review correspondence for employment application received from Shelby Jordan's office and draft correspondence regarding same.	0.30
01/05/2023	E. Weaver	B160/	Procure proposed order approving interim compensation for Crowe & Dunlevy and draft correspondence regarding same.	0.20
01/05/2023	E. Weaver	B320/	Review stipulation and agreed order extending deadline to file plan of reorganization and object to dischargeability in the FSS case (.1); docket extended deadlines for same (.2).	0.30
01/06/2023	C. Craig	B160/	Phone conference to obtain trust formation documents per request by Trustee's Office to provide information regarding retainer paid to Crowe & Dunlevy on behalf of Debtor.	0.20
01/06/2023	C. Craig	B160/	Draft correspondence to obtain trust formation documents per request by Trustee's Office to provide information regarding retainer paid to Crowe & Dunlevy on behalf of Debtor.	0.20

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01/06/2023	C. Stephenson	B110/	Attend FSS Status conference (.5); draft related correspondence (.4); breakfast meeting with B. Schliezer and H. Kessler (1.1); conference regarding financials and schedules matters (1.3); calls and correspondence regarding trust (.8); review and respond regarding open IDI items (.3).	4.40
01/06/2023	C. Stephenson	B160/	Review Missouri Trust document.	0.90
01/06/2023	C. Stephenson	B195/	Nonworking travel to Dallas [billed at half time] (4.0).	2.00
01/06/2023	E. Weaver	B110/	TXSOS search for Atomial, LLC and search for addresses for returned notices of bankruptcy.	1.00
01/06/2023	E. Weaver	B110/	Attention to correspondence from US Trustee's office regarding open items discussed at the initial debtor interview and forward to Blackbriar Advisors.	0.10
01/09/2023	N. Collins	B240/	Research IRS guidance on donations of cryptocurrency for federal income tax purposes.	1.70
01/09/2023	C. Craig	B210/	Review and analyze correspondence from utility provider regarding utility motion (.2); review client info to develop response to same (.2); draft response to utility provider (.2).	0.60

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01/09/2023	V. Driver	B110/	Calls and emails with client and financial advisors preparing for 341 meeting (1.3); review and analyze comments to first day orders and related issues on upcoming hearing (1.2).	2.50
01/09/2023	V. Driver	B150/	Emails with T. Whitley at Security bank on motor home loan and guaranty (.3); emails with committee counsel on status calls (.2).	0.20
01/09/2023	C. Stephenson	B160/	Review and respond to UCC correspondence regarding objection deadlines and proposed meeting times (.6); revise proposed orders (.8); draft UST correspondence regarding same (.8); review and respond to correspondence regarding interim compensation procedures (.6).	2.80
01/09/2023	C. Stephenson	B190/	Review client documents and information and draft related correspondence.	4.40
01/09/2023	C. Stephenson	B210/	Attention to utility communication and draft related correspondence.	0.40
01/09/2023	E. Weaver	B110/	Research notice address for customers in bankruptcy and coordinate service of Utilities motion to updated address.	0.40
01/09/2023	E. Weaver	B160/	Review revised proposed order granting interim compensation procedures with comments from the UST and UCC.	0.10

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01/10/2023	C. Craig	B120/	Review and analyze client-provided materials to develop infographs on debtor business relationship (2.0); develop infographs on debtor business relationships (1.5).	3.50
01/10/2023	C. Craig	B160/	Draft changes to Shelby Jordan affidavit and Driver dec.	1.10
01/10/2023	V. Driver	B110/	Calls with BlackBriar on progress in financial information for schedules and statements and remaining gaps in same.	1.10
01/10/2023	V. Driver	B120/	Analyze need and contents of org chart for UST and other parties in interest (.6); review and revise same (.3); update committee on general status of financial investigation and related matters via email (.6); emails on security bank balance (.2).	1.70
01/10/2023	V. Driver	B130/	Email with counsel for security bank regarding status of creditor as unsecured due to guaranty (.2); emails regarding loan statement and outstanding balance (.2).	0.40
01/10/2023	V. Driver	B160/	Review and approve supplemental declaration for C&D employment application (.4); emails and analysis of emails from committee on differences in matrix and our disclosure listing (.4).	0.80

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01/10/2023	C. Stephenson	B110/	Call with UST regarding schedules and proposed order changes (.5); draft and review related correspondence (.4).	0.90
01/10/2023	C. Stephenson	B110/	Prepare for and attend initial 341 meeting (2.8); client call regarding same (.6); draft and review related correspondence (.8); call with UST regarding same (.3); call with financial advisors regarding same (.3).	4.80
01/10/2023	C. Stephenson	B160/	Review and respond to multiple UCC correspondence (.8); review conflict inquiry (.7); review and revise supplemental declaration (.7).	2.20
01/10/2023	C. Stephenson	B190/	Draft correspondence regarding follow up on requests for documents from PQPR and D. Jones (.4); draft correspondence regarding additional client documents (1.6).	2.00
01/10/2023	E. Weaver	B110/	Review and search client files for Mountain Way, LLC and AJ Agreement(s).	0.20
01/10/2023	E. Weaver	B110/	Review and download document production FSS shared with PQPR's counsel and Subchapter V Trustee.	0.60
01/10/2023	E. Weaver	B120/	Electronic document and case file management of trust files, intellectual property files, and sales reconciliation report received from Ray Battaglia.	2.80

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01/10/2023	E. Weaver	B130/	Review email correspondence regarding past due loan with Security Bank and question regarding payoff of loan after FSS case filed.	0.10
01/11/2023	N. Collins	B240/	Draft summary correspondence to Vickie Driver and Crissie Stephenson regarding the tax treatment of bitcoin donations.	0.80
01/11/2023	V. Driver	B120/	Work with financial advisors to organize documents for committee review in rolling production format (.7); follow up with counsel for D. Jones on production of information or documents (.2).	0.90
01/11/2023	V. Driver	B150/	Initial weekly call with UCC lawyers to discuss various letters set, responses to same, and general working protocols and document production status.	0.90
01/11/2023	C. Stephenson	B110/	Review and analyze Org Chart and draft related correspondence (1.4); revise Org chart PowerPoint (.3).	1.70
01/11/2023	C. Stephenson	B110/	Draft correspondence regarding continued 341 Meeting (.6); draft stipulation regarding same (.8).	1.40
01/11/2023	C. Stephenson	B150/	Prepare for and attend UCC call regarding various matters.	0.70

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01/11/2023	C. Stephenson	B160/	Review and respond to UCC correspondence regarding conflicts list (.2); draft and review correspondence regarding supplemental declarations (1.7).	1.90
01/11/2023	C. Stephenson	B190/	Review and respond to correspondence from S. Roberts regarding requests for information.	0.40
01/11/2023	E. Weaver	B120/	Review and compile storage unit information/documents and forward to Ray Battaglia via fileshare.	0.40
01/11/2023	E. Weaver	B120/	Electronic case file management and index 08-29-22 document production FSS shared with PQPR's counsel and Subchapter V Trustee.	1.80
01/11/2023	E. Weaver	B150/	Review notice of continued meeting of creditors and docket new date and time for meeting.	0.20
01/12/2023	V. Driver	B110/	Emails regarding sharing confidential information and documents with UST.	0.30
01/12/2023	V. Driver	B120/	Review correspondence with counsel for D. Jones regarding outstanding information requests (.2).	0.20
01/12/2023	V. Driver	B160/	Emails to set time to talk with CT attorney on employment and retainer accounting.	0.20

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01/12/2023	A. Gerard	B110/	Review conflicts documents to determine reason for presence of certain parties on disclosure and arrange for additional conflicts check on new entities and individuals.	1.00
01/12/2023	C. Stephenson	B110/	Review and respond to UST correspondence regarding stipulation.	0.20
01/12/2023	C. Stephenson	B160/	Review and respond to correspondence regarding supplemental declarations (.8); draft correspondence regarding conflicts list matters (.6).	1.40
01/12/2023	C. Stephenson	B185/	Review limited objection to Motion to Set Deadline to Accept or Reject Executory Contracts (.5); draft related correspondence (.3); review and respond to correspondence regarding leases for storage (.4).	1.20
01/12/2023	C. Stephenson	B240/	Review and respond to correspondence regarding tax returns.	0.20
01/12/2023	E. Weaver	B110/	Finalize and file stipulation and agreed order regarding additional extension of time of debtor to file his schedules and statements.	0.40
01/12/2023	E. Weaver	B160/	Finalize and file supplemental declaration of Vickie Driver in support of application to employ Crowe & Dunlevy.	0.40

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01/12/2023	E. Weaver	B160/	Finalize and file supplemental declaration of Shelby Jordan in support of application to employ Jordan & Ortiz.	0.40
01/13/2023	C. Craig	B110/	Review local rules regarding hearing requirements in advance of January 20 hearing.	0.20
01/13/2023	C. Craig	B190/	Review and analyze final judgment entered against Debtor in Texas state court action	0.20
01/13/2023	V. Driver	B210/	Call to discuss business operations.	0.50
01/13/2023	C. Stephenson	B110/	Review UCC correspondence regarding UST stipulation.	0.50
01/13/2023	C. Stephenson	B160/	Draft correspondence regarding additional parties conflicts searches.	0.60
01/13/2023	E. Weaver	B110/	Draft agenda for hearing on 01-20-23 regarding utilities motion.	0.40
01/13/2023	E. Weaver	B120/	Review client documents (.1); email correspondence to Blackbriar regarding 2018, 2020 (signed) and 2021 tax returns (.2).	0.30
01/13/2023	E. Weaver	B160/	Draft agenda for hearing on 01-20-23 regarding employment of Crowe & Dunlevy and Jordan & Ortiz and compensation.	0.60

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Responsible Attorney
Vickie L. Driver

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01/13/2023	E. Weaver	B190/	Review dallaseservice email inbox and circulate order on plaintiff's motion for leave to amend plaintiffs' fifth amended petition pending in Travis County, Texas.	0.20
01/13/2023	E. Weaver	B190/	Review notice of final judgment filed in the FSS case by Neil Heslin and Scarlett Lewis and circulate to team.	0.40
01/14/2023	V. Driver	B210/	Calls with AJ and ESG on status of contracts with FSS and related issues on disclosure (1.1); emails with ESG regarding same (.4); call with R. Battaglia on coordinating cases.	1.50
01/14/2023	V. Driver	B210/	Calls with AJ and ESG on status of contracts with FSS and related issues on disclosure (1.1); emails with ESG regarding same (.4); call with R. Battaglia on Coordination Cases (.6).	2.10
01/16/2023	V. Driver	B120/	Review documents and information on payments made and prenup payment requirements.	1.80
01/16/2023	V. Driver	B150/	Review emails from creditors.	0.40
01/16/2023	V. Driver	B160/	Emails with Texas lawyers on retention status.	0.20

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Vickie L. Driver

Post - petition

01/16/2023	V. Driver	B210/	Call with financial advisors regarding current contracts between client and ESG and FSS and eSG (.8); review eSG contract with FSS regarding termination language and terms (.4).	1.20
01/16/2023	C. Stephenson	B150/	Conference call regarding committee issues (.6); review related pleading (1.7).	2.30
01/17/2023	C. Craig	B110/	Review local rules regarding exhibit and witness list requirements (.2); draft exhibit and witness list for January 20 hearing on applications to employ bankruptcy counsel, the Utility Motion, and Motion for Interim Compensation Procedures (.5).	0.70
01/17/2023	V. Driver	B110/	Analyze payments and responsiveness for SOFA (.7); check on sending tax returns to committee (.1).	0.80
01/17/2023	V. Driver	B140/	Review and analyze motion for relief from stay filed by De La Rosa and joint plaintiff to pursue to liquidate in stat court and outline response to same.	1.70
01/17/2023	V. Driver	B160/	Call with Texas Litigation lawyers on retention status and terms (.7); email to CT lawyer on information needed on retainer/payments/outstanding amount for retention (.1).	0.80

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01/17/2023	V. Driver	B210/	Review letters from committee counsel and work on responding to same.	1.20
01/17/2023	V. Driver	B210/	Review interim FSS cash collateral order and emails with co- counsel on same.	0.50
01/17/2023	A. Gerard	B150/	Draft correspondence to David Zensky, attorney for committee of unsecured creditors, regarding status and progress of financial disclosures.	1.80
01/17/2023	E. Weaver	B120/	Work with Akin Gump's litigation support and sharefile link to forward all available tax returns.	0.80
01/17/2023	E. Weaver	B160/	Analyze, organize and index client files related to document production FSS shared with PQPR's counsel.	3.20
01/18/2023	C. Craig	B110/	Develop bankruptcy strategy to reach discharge for debtor.	0.40
01/18/2023	C. Craig	B210/	Preparation for hearing on utility motion.	0.10
01/18/2023	V. Driver	B110/	Team meeting on status of schedules, SOFA, and IDI materials.	0.80
01/18/2023	V. Driver	B150/	Call with committee counsel on pending matters (.7); emails with Security Bank regarding claim in AJ case versus FSS (.2).	0.90

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01/18/2023	V. Driver	B160/	Analyze issues to cover in 327(e) employment apps for litigation counsel and terms of retention for same (.9); review conflict lists for lawyers to run for disinterestedness and conflicts purposes (.3); review request from family attorney for payment and respond with requirement to be employed in case to perform services or be paid by the estate (.4).	1.60
01/18/2023	V. Driver	B210/	Review email from ESG on FSS billing issues (.3); review revised email from ESG on pending matters (.9).	1.20
01/18/2023	A. Gerard	B110/	Review and delegate list of pending matters in bankruptcy case, including fee applications, updating conflicts, interim compensation procedures, and review of executory contracts.	0.80
01/18/2023	A. Gerard	B160/	Begin drafting employment applications and accompanying declarations for special trial counsel and special appellate counsel.	1.50
01/18/2023	A. Gerard	B160/	Email correspondence with proposed special counsel regarding updated conflicts list.	0.30
01/18/2023	C. Stephenson	B110/	Draft Agenda for hearing and related correspondence (1.2); review and revise witness and exhibit list for hearing (.8).	2.00

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01/18/2023	C. Stephenson	B150/	Prepare for and attend call with UCC.	0.70
01/18/2023	C. Stephenson	B160/	Revise employment orders (.4); draft related correspondence (.6).	1.00
01/18/2023	C. Stephenson	B185/	Draft revised order granting Motion to Set Time to Assume or Reject (.8); draft related correspondence (.8).	1.60
01/18/2023	C. Stephenson	B210/	Draft and review correspondence regarding utility communications in preparation for hearing regarding same.	0.80
01/18/2023	E. Weaver	B130/	Review and compare IP client files to those received in email from Ray Battaglia to ensure we have received all files.	0.30
01/18/2023	E. Weaver	B160/	Draft witness and exhibit list for hearing on 01-20-2023.	0.70
01/18/2023	E. Weaver	B160/	Service email to all parties in interest with Exhibit 7 to witness and exhibit list.	0.20
01/19/2023	C. Craig	B110/	Perform research regarding motion to seal debtor's schedules and statements.	0.30
01/19/2023	C. Craig	B160/	Draft revisions to proposed order granting application to employ Rachel Kennerly as Debtor's tax accountant based on comments by Trustee's office.	0.20

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01/19/2023	C. Craig	B160/	Draft revisions to proposed order granting application to employ Blackbriar Financial based on comments by Trustee's office.	0.20
01/19/2023	V. Driver	B110/	Review rules for sealing material filed on the docket and compare to FSS sealing efforts in its case to evaluate need in current case (1.1); review agenda for hearings (.3); preparation for hearings (1.6); review withdrawal of appearance for certain plaintiffs (.4).	3.40
01/19/2023	V. Driver	B140/	Review and respond to COC request from Texas plaintiff lawyer.	0.20
01/19/2023	V. Driver	B160/	Review information needed to finalize drafts employment aps for Texas lawyers and review how to obtain same.	0.30
01/19/2023	V. Driver	B210/	Emails scheduling marketing meeting with FSS.	0.30
01/19/2023	A. Gerard	B160/	Correspondence with proposal trial and appellate counsel regarding applications to employ.	0.50
01/19/2023	A. Gerard	B160/	Continue drafting employment applications for trial and appellate counsel for Debtor's state court matters.	3.00

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01/19/2023	A. Gerard	B185/	Complete research on determining whether various types of contract are executory in the Fifth Circuit (2.0); review various of Debtor's contracts to determine executory nature of same (2.0); complete memorandum summarizing findings (.6).	4.60
01/19/2023	C. Stephenson	B110/	Finalize agenda and redlined orders for filing in preparation for hearing (1.9); address issue regarding incorrect party on matrix (.5); review and respond to UST correspondence regarding same (.4).	2.80
01/19/2023	C. Stephenson	B160/	Review and analyze issues regarding interim compensation order.	0.80
01/19/2023	C. Stephenson	B160/	Draft correspondence regarding proposed orders for professionals whose applications were filed with negative notice.	0.60
01/19/2023	C. Stephenson	B185/	Review and incorporate comments to proposed order on Motion to Set Time to Assume or Reject.	1.30
01/19/2023	E. Weaver	B110/	Finalize and file clean and redlined version of proposed order granting emergency utility motion.	0.30

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01/19/2023	E. Weaver	B160/	Finalize and file clean and redlined version of proposed order granting motion establishing procedures for interim compensation and reimbursement of expenses.	0.30
01/19/2023	E. Weaver	B160/	Finalize and file agenda for hearing on 01-20-2023.	0.30
01/19/2023	E. Weaver	B160/	Compile pleadings and exhibits for hearing on 01-20-2023 - hearing prep.	3.80
01/19/2023	E. Weaver	B160/	Finalize and file clean and redlined version of proposed order granting application for employment of Crowe & Dunlevy.	0.30
01/19/2023	E. Weaver	B160/	Finalize and file clean and redlined version of proposed order granting application for employment of Jordan & Ortiz.	0.30
01/20/2023	N. Collins	B240/	Commence researching IRS Guidance regarding tax treatment of gifts and payment of bitcoin and calculation of basis for federal income tax purposes.	1.60
01/20/2023	V. Driver	B110/	Calls with BlackBriar on MOR and review and analyze draft of same (1.1); call with UST on filing delay (.2); messages with UCC on delay of first MOR (.3).	1.60
01/20/2023	V. Driver	B120/	Attend hearing on Motion to Reconsider employment of firms in FSS.	1.10

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01/20/2023	V. Driver	B140/	Brief review of stay motions filed in AJ and FSS cases.	0.70
01/20/2023	V. Driver	B160/	Prepare for and attend hearings on Applications to employ estate professionals.	1.20
01/20/2023	A. Gerard	B160/	Prepare for and attend hearing on employment of C&D and BlackBriar, interim compensation procedures, and submission date for Debtor's schedules and statements.	2.20
01/20/2023	C. Stephenson	B160/	Prepare for and attend hearing on professional employment applications and interim compensation motion.	4.70
01/20/2023	C. Stephenson	B160/	Draft and review correspondence regarding proposed orders on professional orders.	0.50
01/20/2023	C. Stephenson	B185/	Draft and review correspondence regarding proposed order on Motion to Set Date to Assume or Reject.	0.50
01/20/2023	E. Weaver	B110/	Docket extended deadline to file schedules and statements.	0.10
01/20/2023	E. Weaver	B160/	Docket deadline to file first monthly fee statement.	0.10
01/20/2023	E. Weaver	B160/	Finalize and file clean and redlined version of proposed order granting application to employ Rachel Kennerly as tax accountant.	0.30

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01/20/2023	E. Weaver	B160/	Finalize and file clean and redlined version or proposed order granting application to employ Blackbriar Advisors as financial advisor.	0.30
01/21/2023	V. Driver	B120/	Emails on corrective deed needed on homestead.	0.20
01/21/2023	V. Driver	B160/	Emails regarding format of monthly fee statements with estate professionals.	0.30
01/21/2023	V. Driver	B210/	Emails with co-counsel on meeting to discuss FSS operations.	0.20
01/23/2023	N. Collins	B240/	Review ledger of donations of cryptocurrency to determine tax basis; analyze IRS guidance regarding cryptocurrency.	0.60
01/23/2023	N. Collins	B240/	Call and correspondence regarding the tax treatment of listener donations made via Bitcoin and the applicable tax rules for donations (1.0); evaluate correspondence from client's CPA regarding the tax treatment (.9).	1.90
01/23/2023	N. Collins	B240/	Research regarding the tax treatment of cryptocurrency.	2.70

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01/23/2023	V. Driver	B110/	Review and analyze MOR draft and provide comments to same (1.2); call with UST on delay of MOR (.2); message for UCC on delay of MOR (.1); call with client to discuss status of MOR and set up review time (.3); review revised draft of MOR and provide comments to same (1.2).	3.00
01/23/2023	V. Driver	B120/	Review and respond to emails from J. Schultz on issues with CC processing changes (.2); call with client and financial advisors on issues with operations at FSS (.4).	0.60
01/23/2023	C. Stephenson	B110/	Review MOR and related correspondence.	1.60
01/23/2023	C. Stephenson	B185/	Draft and review correspondence regarding proposed order on Motion to Set Date to Assume or Reject.	0.50
01/23/2023	E. Weaver	B160/	Review interim compensation procedures order and draft first interim fee statement.	2.20
01/24/2023	N. Collins	B240/	Draft summary correspondence regarding the applicable tax treatment of the transfers of cryptocurrency.	1.70
01/24/2023	N. Collins	B240/	Discussion regarding the facts and circumstances relating to the donations of cryptocurrency.	1.20

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01/24/2023	N. Collins	B240/	Review and analyze Coinbase donation ledger to determine the available information with respect to the donations.	0.90
01/24/2023	V. Driver	B185/	Travel to Austin, Texas for meetings with Jones (3.6) – billed at half time.	1.80
01/24/2023	V. Driver	B190/	Review email from plaintiff's counsel on potential defamation claim (.3); call with client on same (.4); review interview for background of demand (.7); outline response to same and lay out evidence to support defense (.4).	1.80
01/24/2023	C. Stephenson	B110/	Review revised MOR.	0.80
01/24/2023	C. Stephenson	B160/	Review correspondence regarding fee statement matters.	0.80
01/24/2023	E. Weaver	B110/	Revise, finalize and file December MOR.	1.00
01/24/2023	E. Weaver	B110/	Electronic document and case file management of December bank statements (2.5); email correspondence to and from Akin Gump regarding bank statements (.2); prepare sharefile link and circulate bank statements to UCC and Blackbriar (.5).	3.20
01/24/2023	E. Weaver	B160/	Prepare exhibits A and B to first monthly interim fee statement.	1.00
01/25/2023	C. Stephenson	B150/	Prepare for and attend call with UCC.	0.70

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01/25/2023	C. Stephenson	B160/	Correspondence regarding fee statement (.8); review and revise prebill regarding same (1.8).	2.60
01/25/2023	E. Weaver	B140/	Review and circulate to team motion for relief from stay (.2); docket objection deadline and hearing date for same (.2).	0.40
01/26/2023	C. Stephenson	B160/	Draft correspondence regarding revisions to fee statement (1.4); conference regarding same (.8); review and revise draft statement document (.8); review final invoice (1.1).	4.10
01/26/2023	E. Weaver	B160/	Review UCC's employment application and docket objection deadline for same.	0.20
01/26/2023	E. Weaver	B185/	Review email correspondence to Ray Battaglia regarding deadline to assume or reject deadline in the FSS case (.1); review case docket regarding same (.2).	0.30
01/26/2023	E. Weaver	B185/	Review leases received from Ray Battaglia, code and save to Litshare.	0.80
01/27/2023	C. Stephenson	B160/	Review and revise financial advisors fee statement (.8); review and revise Crowe & Dunlevy fee statement (1.3); draft related correspondence (1.8).	3.90

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01/27/2023	E. Weaver	B160/	Revise, finalize and file first monthly fee statement of Crowe & Dunlevy (2.4); email correspondence to notice parties with service copy of fee statement (.2).	2.60
01/27/2023	E. Weaver	B160/	Revise, finalize and file first monthly fee statement of Blackbriar Advisors (1.4); email correspondence to notice parties with service copy of fee statement (.2).	1.60
01/30/2023	C. Craig	B160/	Draft application to employ the Reynal Firm, declaration in support of same, and proposed order granting same.	1.30
01/30/2023	E. Weaver	B130/	Review information received from the Guadalupe County Tax Office (.1); procure quitclaim deeds for the Guadalupe and Lake Travis properties and forward to Blackbriar Advisors (.4).	0.50
01/30/2023	E. Weaver	B160/	Search emails for communications with Chris Martin and forward to team in preparation of employment application for Martin, Disiere, Jefferson & Wisdom and forward to team.	0.20
01/31/2023	C. Craig	B160/	Draft application to employ the Reynal Law Firm as special counsel to Debtor (.3); draft declaration in support of same (.3); exchange correspondence with the Reynal Law Firm regarding same (.1).	0.70

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01/31/2023	A. Gerard	B110/	Email correspondence with counsel for other parties regarding availability and setting a date for the next omnibus hearing.	0.50
01/31/2023	A. Gerard	B140/	Begin review of relevant legal authority in preparation for drafting objection to Pozner and De La Rose motion to lift stay.	1.70
01/31/2023	A. Gerard	B160/	Email correspondence regarding obtaining updated engagement agreements for Debtor to include with employment applications for trial and appellate counsel.	0.50
01/31/2023	C. Stephenson	B110/	Attend UCC FA introduction call.	0.50
01/31/2023	C. Stephenson	B185/	Review and respond to creditor correspondence regarding proposed order for motion to set date to assume or reject employment contract (.4); draft Court correspondence (.2); review and revise proposed order (.2).	0.80
01/31/2023	E. Weaver	B120/	Electronic case file management of litigation settlement trust, additional IP documents and Aurian FSS files.	4.20
01/31/2023	E. Weaver	B185/	Finalize and file proposed order granting motion to fix a date by which debtor must assume or reject executory contract.	0.30

Total Hours	222.00
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Total Fees for this Invoice

\$130,221.00

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	62.00	39,179.00	Bankruptcy - Case Administration
B120	20.90	9,590.50	Bankruptcy - Asset Analysis and Recovery
B130	1.30	583.50	Bankruptcy - Asset Disposition
B140	4.70	2,771.50	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B150	8.80	5,734.00	Bankruptcy - Meetings of and Communications with Creditors
B160	71.80	37,588.00	Bankruptcy - Fee/Employment Applications
B185	13.70	7,649.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	9.70	6,642.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	4.00	2,860.00	Bankruptcy - Non-Working Travel
B210	11.50	8,548.50	Bankruptcy - Business Operations
B240	13.30	8,985.50	Bankruptcy - Tax Issues
B320	0.30	88.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
Total	222.00	\$130,221.00	

01/04/2023	Stephenson, Christina reimbursement for working meal	\$34.60
01/06/2023	Stephenson, Christina reimbursement of travel expenses to Austin Texas during client meeting 1/4-6/2023; transportation \$ 258.00, lodging \$ 498.91 and dinner \$ 194.11	951.02
01/10/2023	Stephenson, Christina reimbursement for working meal with Harold Kessler, Allison and Vickie Driver 12/7/2022	100.19
Subtotal of Expenses		\$1,085.81
Online Research		\$3.40
Subtotal of Costs		\$3.40
Total Expenses and Costs for this Invoice		\$1,089.21

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E106	3.40	On-line research
E110	951.02	Out-of-town travel
E111	134.79	Meals
Total	\$1,089.21	

Total For This Invoice

\$131,310.21

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SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
V. Driver	43.10	795.00	34,264.50
C. Stephenson	87.40	715.00	62,491.00
E. Weaver	48.50	295.00	14,307.50
A. Gerard	18.40	345.00	6,348.00
N. Collins	13.10	675.00	8,842.50
C. Craig	11.50	345.00	3,967.50
Total	222.00		\$130,221.00